

FILED

NOV 5 2020

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO.
ST. LOUIS

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)
MATTHEW THILGES,)
Defendant.)

4:20CR00707 AGF/SRW

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term
 - (a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(1));
 - (b) "sexually explicit conduct" to mean actual or simulated--
 - (i) sexual intercourse, including genital-genital, anal-genital, oral-genital, oral-anal, whether between persons of the same or opposite sex,
 - (ii) bestiality,
 - (iii) masturbation,
 - (iv) sadistic or masochistic abuse, or
 - (v) lascivious exhibition of the genitals, anus, or pubic area of any

person (18 U.S.C. §2256(2)(A));

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device.

(18 U.S.C. §2256(6));

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. §2256(8)).

2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.
3. Between on or about January 1, 2018 and October 21, 2020, in the Eastern District of Missouri, and elsewhere,

MATTHEW THILGES,

the Defendant, herein, did knowingly attempt to employ, use, persuade, induce, entice, and coerce a minor female, "J.," to engage in sexually explicit conduct, specifically, **Matthew Thilges** attempted to produce images of "J." in a lascivious display of her genitals and/or anus,

and said sexually explicit conduct was for the purpose of producing a visual depiction of such conduct, to wit: took photographs of "J." partially undressed in an attempt to photograph her genitals and/or anus, and such depictions were produced using materials that had been mailed, shipped, or transported in interstate and foreign commerce, i.e., a cell phone, In violation of Title 18, United States Code, Section 2251(a) and punishable under Title 18, United States Code, Section 2251(e).

COUNT II

The Grand Jury further charges that:

1. The allegations contained in paragraphs one, two, and three of Count I of this Indictment are incorporated by reference as if fully set forth herein.
2. Between on or about January 1, 2019 and October 21, 2020, in the Eastern District of Missouri, and elsewhere,

MATTHEW THILGES,

the defendant herein, did knowingly receive videos and images of child pornography over the internet, a means or facility of interstate commerce, and these videos and images were visual depictions that involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of a minor engaging in sexually explicit conduct, including but not limited to the following:

- 1) "OMEGLE_Vol.17.mkv" – a graphic video file depicting a minor prepubescent male child's genitals being touched by a female;
- 2) "32C349AA8613D0FF1DC988A7C251E79D" – a graphic video file of a minor prepubescent female child performing oral sex;

3) "37WDW.jpg" – a graphic image file that depicts a minor prepubescent female in a three-picture collage where the minor female is depicted standing in front of the camera in a lascivious display of her genitals and with a penis in her mouth.

In violation of Title 18, United States Code, Section 2252A(a)(2).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

COLLEEN C. LANG, #56872MO
Assistant United States Attorney